



7852 Walker Drive, Suite 200, Greenbelt, MD 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: [www.jsitel.com](http://www.jsitel.com), e-mail: [jsi@jsitel.com](mailto:jsi@jsitel.com)

RECEIVED

FEB - 6 2006

Federal Communications Commission  
Office of Secretary

**BY HAND DELIVERY**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
c/o Natek, Inc., Inc.  
236 Massachusetts Avenue, N.E. Suite 110  
Washington, DC 20002

**EB Docket No. 06-36  
EB-06-TC-060**

**Re: CERTIFICATION OF CPNI FILING - FEBRUARY 6, 2006**

**North State Telecommunications Corporation**

Dear Ms. Dortch:

On behalf of the telecommunications carrier listed above, John Staurulakis (JSI), its consultant is filing the attached CPNI Certification together with the statement of procedures for operational compliance with FCC's CPNI rules.

Sincerely,

Scott Duncan  
JSI Staff Director-Regulatory Affairs  
[sduncan@jsitel.com](mailto:sduncan@jsitel.com)

**Attachment**

Copies: 4 additional copies to Secretary  
Byron McCoy, Telecommunications Consumers Division  
Best Copy and Printing (BCPI)

No. of Copies rec'd 044  
List A B C D E

Echelon Building II, Suite 200  
9430 Research Boulevard, Austin, Texas 78759  
Phone: 512-338-0473  
Fax: 512-346-0822

Eagandale Corporate Center, Suite 310  
1380 Corporate Center Curve  
Eagan, Minnesota 55121  
Phone: 651-452-2660  
Fax: 651-452-1909

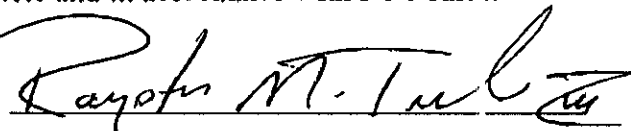
547 South Oakview Lane  
Bountiful, UT 84010  
Phone: 801-294-4576  
Fax: 801-294-5124

4625 Alexander Drive, Suite 135  
Alpharetta, Georgia 30022  
Phone: 770-569-2105  
Fax: 770-410-1608

**North State Telecommunications Corporation  
CERTIFICATION**

I am Royster M. Tucker, III of North State Telecommunications Corporation. I hereby certify that I have personal knowledge that North State Telecommunications Corporation is in compliance with the Federal Communications Commission ("FCC") rules respecting customer proprietary network information ("CPNI") contained in Part 64, Subpart U of the FCC's rules.<sup>1</sup> Accompanying this certificate is a statement explaining how North State Telecommunications Corporation is in compliance with the FCC's CPNI rules. I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.

Name:



Title:

Executive Vice President

Date:

January 9, 2006

Attachment

<sup>1</sup>

47 C.F.R. §§ 64.2001-2009.

**North State Telecommunications Corporation**  
**North State Telephone Company, d/b/a North State Communications**  
**North State Communications, Inc.**  
**North State Communications Long Distance, LLC**  
**North State Communications Advanced Services, LLC**

**STATEMENT OF FCC CPNI RULE COMPLIANCE**

This statement serves to explain how North State Telecommunications Corporation ("NSTC") family of companies (collectively, the Company) is complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. §§ 64.2000-2009).

**1. Integrated Nature of CPNI Practices**

The Company is a family of affiliated companies providing telecommunications services. FCC rules require that the Company has separate affiliates for some services, but allows those separate affiliates to have common employees. North State Telephone Company, d/b/a North State Communications is made up of the incumbent local exchange company, Personal Communications Service, and Internet groups. Customers may not always be aware that different, individual affiliates of the Company provide them with specific telecommunications services. The Company's affiliates include the following companies:

North State Telephone Company, d/b/a North State Communications  
North State Communications Long Distance, LLC  
North State Communications Advanced Services, LLC  
North State Communications, Inc.

No matter which of the Company's affiliates provides a service, the employees of a single affiliate may provide customer service and support to the customers of the other affiliates. In other cases, employees may be dedicated to a single Company affiliate but still rely on operational support systems common to all of the Company's affiliates. Thus, the Company's practices for complying with the FCC's CPNI rules are on an integrated Company basis. References to "employees" in this document refer to employees of the Company as a whole.

North State Telecommunications Corporation  
STATEMENT OF FCC CPNI RULE COMPLIANCE

**2. Identification of CPNI**

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the FCC's rules at Part 64, Subpart U, Section 64.2003(d).

**3. Identification of Services Affected by CPNI Rules**

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI. These services are:

Telecommunications Services:

Local (ILEC/CLEC)  
Interexchange (long distance)  
CMRS (cellular, PCS, and paging)

Non-telecommunications Services

Internet  
Voice Mail

Inside Wiring

CPE (Customer Premise Equipment)

**4. Identification of Permissible Uses of CPNI Without Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under the FCC's Part 64, Subpart U, Section 64.2005.

**5. Identification of Uses of CPNI Requiring Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under the FCC's rules at Part 64, Subpart U, Section 64.2007.

**6. Customer Notification and Authorization Process**

The Company has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under the FCC's Part 64, Subpart U CPNI rules. FCC's CPNI rules at Part 64, Subpart U, Section 64.2008.

North State Telecommunications Corporation  
STATEMENT OF FCC CPNI RULE COMPLIANCE

**7. Training**

The Company has trained existing employees having access to, or occasion to use CPNI, as to when they are and are not authorized to use CPNI. For new employees having access to, or occasion to use CPNI, the Company will include such training as part of employee orientation and training.

**8. Disciplinary Process**

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC's Part 64, Subpart U CPNI rules.

**9. Supervisory Review Process for Outbound Marketing**

The Company has established a supervisory review process regarding its compliance with the rules in Part 64, Subpart U, for outbound marketing situations. Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.